

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

JEREMY CLARK,

Plaintiff,

Case No.: 17-CV-0393

v.

HEATHER HEINEN,

Defendants.

PLAINTIFF'S RULE 26(a)(3)(A) AND (B) DISCLOSURES

Plaintiff Jeremy Clark, by his counsel, Cade Law Group LLC, submits his Rule 26(a)(3)(A) and (B) Disclosures, as follows:

NAMES OF POTENTIAL WITNESSES

1. Plaintiff, Jeremy Clark.
2. Defendant, Heather Heinen.
3. Marcus St. Clair (DOC # 643717) – Mr. St. Clair currently is incarcerated in the Stanley Correctional Facility, 100 Corrections Drive, Stanley, Wisconsin 54768, but is the subject of a writ of habeas corpus ad testificandum order.
4. John D. Tiggs (a/k/a A'Kinbo J.S. Hasim, DOC #150033) - Mr. Tiggs currently is incarcerated in the Waupun Correctional Facility, 200 S. Madison Street, Waupun, Wisconsin 53963, but is the subject of a writ of habeas corpus ad testificandum order.
5. Nakisha Stewart, Clinician employed by or working for Dept. of Corrections.
6. K. de Blanc, psychological associate, employed by or working for Dept. of

Corrections

7. Sgt. Trevor H. Klemmer, Corrections officer, Dept. of Corrections.
8. Witnesses needed for authentication of documents: Any medical provided who has provided treatment to Plaintiff Jeremy Clark from January 1, 2016 to March 31, 2017.

EXHIBITS

Plaintiff's exhibit list will be filed as a separate document as of today's date.

Dated this 22nd day of August, 2019.

CADE LAW GROUP LLC

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